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July 25, 2008

Via Facsimile (212) 805-7941

Honorable Loretta A. Preska  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Chambers 1320  
New York, NY 10007-1312

USDC SDNY  
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**Re: Norwegian Bulk Transport A/S v. Pioneer Navigation Ltd.**

Docket number: 08 CV 5591 (LAP)  
LML ref: 08-1483

Dear Judge Preska:

We represent the Plaintiff, Norwegian Bulk Transport A/S, in the captioned action. We write in respect of this Court's Order to Show Cause Why Rule B Maritime Attachment Should Not Be Vacated dated July 23, 2008.

After consultation today with Mr. James Rau, counsel for Defendant Pioneer Navigation, Ltd., and with Your Honor's chambers, Plaintiff respectfully requests an enlargement of the briefing schedule. This request is being made to accommodate the undersigned's vacation schedule and to allow additional time for the parties to try to resolve their security dispute prior to any post-attachment hearing. Specifically, Plaintiff requests that the briefing and hearing schedule be extended as follows:

- (1) Plaintiff's opposition papers due by August 7, 2008;
- (2) Defendant's reply papers, if any, due by August 14, 2008;
- (3) Supplemental Admiralty Rule E(4)(f) hearing on August 19, 2008 at 11:30 a.m.

Mr. Rau, reading in copy, has no objection to the above modifications.

Based on the foregoing, we respectfully request that the Court "so order" these new deadlines. We shall advise the court immediately should the parties be successful in resolving their dispute prior to the hearing.

*So ordered*  
*Loretta A. Preska*  
*USDC*

Respectfully submitted,

*Charles E. Murphy*  
Charles E. Murphy

CEM/bhs

*August 4, 2008*